

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	
<b>v.</b>	)	<b>CR. NO. 02:05-CR-173-T</b>
	)	
<b>RODNEY HARRIS</b>	)	
<b>Defendant ,</b>	)	

**UNOPPOSED MOTION TO ACCEPT 11(c)(1)(C) PLEA AGREEMENT**

COMES NOW, Rodney Harris, by and through undersigned counsel, Maryanne M. Prince, and moves without opposition for the court to accept the parties' 11(c)(1)(C) plea agreement in this case. In support of this motion the defense states:

1. Mr. Harris' current counsel was recently appointed to represent him in this matter.
2. Defense counsel and the Government have been working diligently to resolve problems with Mr. Harris' case, including a lengthy proffer that Mr. Harris' previous attorneys had unfortunately not allowed him to give.
3. Mr. Harris' proffer was completed last week and late last week the Government tendered a plea agreement.
4. Counsel was not able to meet with Mr. Harris to discuss the plea agreement until Monday, February 6, 2006, the last day scheduled for submission of 11(c)(1)(C) plea agreements.
5. On February 6, 2006, counsel filed Mr. Harris' Notice of Intent to Change Plea which was corrected on February 7, 2006.
6. The resolution could not be completed on or before the deadline of submission of 11(c)(1)(C) plea agreements, yet both the Government and the Defense have worked diligently and in good faith toward the resolution of this case.
7. Therefore, there is good cause for allowing the parties to submit an untimely 11(c)(1)(C)

plea agreement in this case.

Respectfully submitted this 7<sup>th</sup> day of February, 2006.

/s/ Maryanne M. Prince

MARYANNE M. PRINCE (MEL007)

ASB-6515-E39M

Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing of this Motion upon the following, by Electronically Filing same and which notice is service is perfected by electronic mail or by hand delivery or placing same in an addressed, postage prepaid envelope and deposited with the U.S. Post Office on this the 7<sup>th</sup> day of February, 2006.

Hon. Clark Morris AUSA

U. S. Attorney's Office

P. O. Box 197

Montgomery, Alabama 36102-0197

/s/ Maryanne M. Prince

MARYANNE M. PRINCE (MEL007)

Attorney for Defendant